## **EXHIBIT C**

McNamara Smith LLP Invoice

EXHIBIT C

# Case 2:18-cv-00030-JCM-BNW Document 364-4 Filed 10/06/21 Page 2 of 24 McNamara Smith LLP

October 01, 2021

**Invoice No:** 11348

Our File No.: 2085-02MS For Services Through: 9/30/2021

Matter: Consumer Defense Receivership

## **INVOICE SUMMARY**

Grand Total	\$83,337.49
Total Disbursements	\$212.49
Total Fees	\$83,125.00

## Case 2:18-cv-00030-JCM-BNW Document 364-4 Filed 10/06/21 Page 3 of 24 **McNamara Smith LLP**

**Invoice No.:** Our File No.: 2085-02MS

11348

For Services Through: 9/30/2021

Matter: Consumer Defense Receivership

### PROFESSIONAL SERVICES

Date	Init.	Description	Hours	Amount
4/1/2020	EC	Revise joint motion to approve Olmsted settlement agreement.	0.50	175.00
	EC	Correspond with J. Barlow re: Olmsted settlement.	0.30	105.00
	EC	Call with realtor re: closing and insurance for Park City condo.	0.30	105.00
	EC	Correspond with G. Ashe re: proposed Olmsted settlement.	0.20	70.00
4/7/2020	EC	Revise joint motion to approve settlement agreement with Olmsted.	0.20	70.00
4/8/2020	SEC	Draft subpoena to McMillen fine art gallery.	0.50	87.50
	EC	Correspond with C. O'Neil and B. Bellamy re: hot tub and boiler.	0.20	70.00
4/10/2020	EC	Correspond with counsel for Velocity re: payoff statement.	0.10	35.00
4/14/2020	EC	Call with C. O'Neil re: Park City condo.	0.10	35.00
4/17/2020	EC	Meet with T. McNamara re: Park City condo.	0.10	35.00
	EC	Call with C. O'Neil re: Park City condo closing.	0.20	70.00
4/22/2020	EC	Review J. Hanley opposition to joint motion to approve settlement agreement.	0.20	70.00
	EC	Call and correspond with J. Barlow re: Sandy office building.	0.20	70.00
	CJBG	Draft reply in support of motion to approve settlement.	2.20	715.00
	EC	Conference call with T. McNamara and C. Gordon re: response to J. Hanley's opposition to motion to approve settlement.	0.20	70.00
	EC	Calls with C. O'Neil re: extension of escrow and closing.	0.20	70.00

Date	Init.	Description	Hours	Amount
4/22/2020	EC	Call with J. Barlow re: Sandy office building and short term lease.	0.20	70.00
4/23/2020	EC	Revise reply in support of motion to approve settlement agreement.	2.20	770.00
	CJBG	Continue to draft reply in support of motion to approve settlement.	1.00	325.00
	EC	Call with C. O'Neil re: escrow extension request for Park City condo.	0.10	35.00
	EC	Call with C. O'Neil re: Park City condo extension.	0.10	35.00
4/24/2020	EC	Revise reply in support of joint motion to approve settlement agreement with Olmsted.	0.40	140.00
4/27/2020	EC	Call with R. Maron re: K. Crump property and AHL mortgage.	0.30	105.00
4/30/2020	SEC	Correspond with RC Automotive re: Porsche.	0.10	17.50
	EC	Call with realtor re: payoff statement.	0.10	35.00
	EC	Call to J. Woodall re: Velocity Capital payoff demand.	0.10	35.00
	EC	Call with J. Hanlon re: payoff demand.	0.20	70.00
5/1/2020	SEC	Correspond with C. Bertram and realtor re: Sandy office building.	0.10	17.50
	EC	Correspond with J. Barlow re: Sandy office building.	0.10	35.00
	EC	Call with J. Hanlon re: Park City closing.	0.10	35.00
	EC	Call to J. Woodall re: Velocity Capital payoff statement.	0.10	35.00
	EC	Correspond with J. Barlow re: Olmsted settlement agreement.	0.10	35.00
	EC	Call to J. Barlow re: Olmsted settlement agreement.	0.10	35.00
5/4/2020	SEC	Correspond with C. Bertram and realtor re: Sandy office building.	0.20	35.00
	SEC	Correspond with Sandy HOA re: payoff statement.	0.20	35.00
	EC	Call with B. Bellamy re: Park City condo.	0.10	35.00
	EC	Call with J. Barlow re: Sandy office building settlement.	0.10	35.00
	EC	Calls with C. O' Neil re: Park City condo closing.	0.20	70.00
5/5/2020	EC	Review case law, payoff demand, and promissory note re: Sandy office building.	0.20	70.00
	SEC	Review tax assessor documents and obtain payoff statement for the Sandy office building.	0.20	35.00
	EC	Call with J. Woodall re: default interest for Sandy office building.	0.10	35.00

Date	Init.	Description	Hours	Amount
5/5/2020	EC	Call with J. Hanlon re: lender payoff and closing for Park City condo.	0.10	35.00
5/6/2020	EC	Review settlement statement for Sandy office building and correspond with J. Barlow re: same.	0.50	175.00
	EC	Revise status report.	2.20	770.00
5/7/2020	EC	Revise status report.	0.40	140.00
	SEC	Review tax assessor documents and obtain payoff statement for the Sandy office building.	0.50	87.50
	EC	Call with J. Woodall re: Velocity Capital payoff demand and closing.	0.10	35.00
	EC	Call with B. Bellamy re: Park City condo closing and J. Hanley personal items.	0.10	35.00
	EC	Call and correspond with C. O'Neil re: Park City condo closing and payoff demand.	0.20	70.00
	EC	Call with J. Barlow re: Sandy office building closing.	0.20	70.00
5/8/2020	EC	Correspond with J. Woodall re: Velocity and Park City condo.	0.20	70.00
	EC	Revise status report.	0.50	175.00
	SEC	Review HOA and tax payoff statements for the Sandy office building.	0.20	35.00
	SEC	Call and correspond with RC Automotive re: sale of Porsche.	0.40	70.00
	EC	Correspond with J. Barlow re: payoff and closing for Sandy office building.	0.10	35.00
	EC	Review Sandy office building settlement statement.	0.10	35.00
	EC	Correspond with J. Woodall re: default interest issue and settlement statement.	0.20	70.00
	EC	Call with B. Bellamy re: accounting for Park City condo.	0.20	70.00
5/11/2020	EC	Review closing documents for Park City condo.	0.70	245.00
	EC	Correspond with J. Barlow re: Sandy office building closing.	0.10	35.00
	EC	Correspond with J. Woodall re: Park City condo and Velocity payoff statement.	0.20	70.00
	EC	Call to and correspond with J. Hanlon re: Velocity Capital and default interest dispute.	0.20	70.00
5/12/2020	EC	Review accounting reports for Park City condo.	0.80	280.00

Date	Init.	Description	Hours	Amount
5/12/2020	EC	Correspond with J. Woodall re: default interest and Velocity payoff.	0.20	70.00
5/13/2020	EC	Correspond with J. Barlow re: Sandy office building.	0.10	35.00
	EC	Revise status report.	0.30	105.00
	SEC	Correspond with C. Bertram re: Sandy office building.	0.20	35.00
	EC	Call with C. O' Neil re: closing for Park City condo.	0.10	35.00
	EC	Correspond with S. Hanley and J. Hanley re: ring.	0.20	70.00
	EC	Revise letter to S. Hanley and J. Hanley re: personal documents.	0.20	70.00
	EC	Review FTC's response to Defendants' ex parte application to take depositions.	0.20	70.00
5/15/2020	EC	Revise notice of release of lis pendens.	0.10	35.00
5/20/2020	EC	Review accounting statement for Park City condo.	2.00	700.00
	EC	Call with B. Bellamy re: accounting statements for Park City condo.	0.30	105.00
	EC	Call to J. Woodall re: Velocity Capital and default interest.	0.10	35.00
5/21/2020	SEC	Call with L. Jones re: AHL mortgages.	0.10	17.50
5/22/2020	EC	Call with L. Jones re: AHL mortgages.	0.10	35.00
5/28/2020	EC	Correspond with J. Hanley re: personal items.	0.20	70.00
5/29/2020	EC	Review documents and financial information in preparation for receivership survey.	0.60	210.00
	EC	Revise receivership survey.	0.60	210.00
6/1/2020	EC	Revise receivership survey.	0.20	70.00
6/2/2020	SEC	Review AHL mortgage portfolio documents.	0.20	35.00
	EC	Correspond with T. McNamara re: Sandy office building.	0.10	35.00
	EC	Correspond with G. Ashe re: receivership survey.	0.20	70.00
6/3/2020	SEC	Call and correspond with RC Automotive re: camping trailer.	0.20	35.00
6/11/2020	EC	Revise proposed order re: fee application.	0.30	105.00
6/15/2020	EC	Review AHL mortgages.	0.40	140.00
	EC	Review K. Crump mortgage and call with R. Maron re: same.	0.50	175.00

Date	Init.	Description	Hours _	Amount
10/2/2020	SEC	Correspond with S. Shelton transmitting requested documents re: AHL mortgage.	0.10	17.50
	SEC	Update consumer AHL mortgage chart re: responses to settlement proposals.	0.40	70.00
	SEC	Draft letter to AHL borrower re: receivership history and settlement proposal.	0.90	157.50
	EC	Calls with consumers re: AHL mortgages.	0.50	175.00
10/5/2020	SEC	Call with C. Edge re: AHL mortgage payments.	0.10	17.50
	SEC	Draft letter to AHL borrower re: mortgage obligations.	0.40	70.00
	EC	Call with L. Edge re: settlement proposal.	0.10	35.00
10/6/2020	SEC	Call with AHL borrower re: mortgage payment.	0.10	17.50
	SEC	Draft and finalize, prepare exhibits, and send letter to AHL borrower.	0.70	122.50
	SEC	Review records and update consumer AHL mortgage chart.	1.00	175.00
	EC	Revise letter to AHL borrower.	0.50	175.00
10/7/2020	SEC	Call with L. Crahan re: settlement payments.	0.10	17.50
	SEC	Correspond with AHL borrower re: settlement payment.	0.10	17.50
	EC	Correspond with G. Ashe re: LoanPost and consumer redress.	0.10	35.00
10/8/2020	SEC	Correspond with AHL borrower resending mortgage documents requested.	0.10	17.50
	EC	Correspond with E. May re: R. Davis mortgage.	0.20	70.00
10/9/2020	SEC	Correspond with C. Bertram re: artwork.	0.10	17.50
	SEC	Call re: settlement payments.	0.10	17.50
	SEC	Revise listing for artwork.	0.20	35.00
	EC	Call with B. Bellamy re: Park City condo.	0.10	35.00
10/12/2020	EC	Revise letter to R. Bamke re: AHL mortgage.	0.20	70.00
	SEC	Call with AHL borrower re: mortgage payment plan.	0.10	17.50
	SEC	Draft letter to R. Bamke re: receivership and AHL mortgage obligation; prepare exhibits and send to same.	0.80	140.00
	EC	Call with R. Bamke re: AHL mortgage.	0.20	70.00

Date	Init.	Description	Hours	Amount
10/16/2020	EC	Correspond with R. Maron re: K. Crump.	0.20	70.00
10/19/2020	SEC	Review Minnesota Attorney General's documents re: AHL borrower complaint.	0.20	35.00
	SEC	Call and correspond with AHL borrowers re: settlement offers.	0.80	140.00
10/26/2020	SEC	Call and correspond with R. Bamke re: settlement payment.	0.20	35.00
10/27/2020	SEC	Call with E. May re: consumer R. Davis' settlement.	0.20	35.00
10/28/2020	SEC	Calls with R. Bamke and M. Rhoden re: AHL mortgage settlements.	0.30	52.50
10/30/2020	SEC	Call with AHL borrower re: mortgage settlement.	0.10	17.50
11/2/2020	SEC	Call and correspond with C. Bertram re: photos of artwork.	0.30	52.50
	SEC	Revise listing and re-list artwork on eBay.	0.30	52.50
	SEC	Draft release of AHL mortgage and letter to Lake County Clerk's office re: recording same.	1.60	280.00
11/3/2020	SEC	Confer with T. McNamara and C. Gordon re: settlement offers.	0.20	35.00
	SEC	Call with N. Campbell re: AHL borrower's settlement offer.	0.30	52.50
	SEC	Call and correspond with C. Bertram re: artwork.	0.30	52.50
	SEC	Draft release of AHL mortgage and transmittal form for borrower.	0.50	87.50
11/4/2020	SEC	Revise AHL mortgage release documents for borrowers.	0.40	70.00
11/5/2020	SEC	Call with AHL borrower re: settlement.	0.20	35.00
	SEC	Correspond with jewelers re: diamond sale.	0.20	35.00
11/6/2020	SEC	Call and correspond with multiple AHL borrowers re: settlement offers.	0.50	87.50
11/9/2020	SEC	Correspond with AHL borrowers re: settlement.	0.20	35.00
	SEC	Review records re: tax sale affecting property with AHL mortgage.	0.20	35.00
	CJBG	Draft correspondence to various parties re: settlements offered to AHL borrowers with mortgages.	1.00	325.00
11/10/2020	CJBG	Review AHL borrowers' offers in response to Receiver's proposed mortgage settlements.	0.30	97.50
11/11/2020	SEC	Discuss AHL mortgage releases with L. Jones.	0.20	35.00
	SEC	Call and correspond with AHL borrowers re: settlements.	0.40	70.00

Date	Init.	Description	Hours	Amount
11/11/2020	SEC	Review documents related to sale of Park City condo.	0.60	105.00
11/12/2020	CJBG	Review new offers from AHL borrowers in response to Receiver's proposed mortgage settlements.	0.20	65.00
	SEC	Update chart re: AHL mortgage settlement offers and payments.	0.50	87.50
11/13/2020	CJBG	Review new offers from AHL borrowers in response to Receiver's proposed mortgage settlements.	0.20	65.00
11/16/2020	SEC	Call with AHL borrower re: mortgage settlement.	0.10	17.50
	SEC	Review recording rules in multiple counties, draft and prepare AHL mortgage releases and required paperwork.	1.50	262.50
11/17/2020	SEC	Review records re: recording and correspond with L. Jones re: same.	0.50	87.50
11/18/2020	SEC	Confer with C. Gordon, T. McNamara, and L. Jones re: AHL mortgage settlements.	0.80	140.00
	SEC	Draft motion to extend receivership.	0.90	157.50
	CJBG	Review AHL borrower's mortgage documents and offers.	0.50	162.50
11/19/2020	SEC	Meet with C. Gordon re: AHL mortgage settlements.	0.50	87.50
	CJBG	Confer with S. Carroll re: status of AHL borrowers' mortgage payoffs.	0.50	162.50
11/20/2020	SEC	Call with AHL borrower re: mortgage settlement.	0.10	17.50
	CJBG	Correspond with AHL borrowers re: payoff demands.	0.20	65.00
11/24/2020	SEC	Conduct research to identify possible buyers of distressed AHL mortgages.	0.40	70.00
	SEC	Draft mortgage releases for AHL borrowers who accepted settlement; research recording procedures and prepare for recording.	2.50	437.50
11/25/2020	SEC	Revise mortgage release statements for settling AHL borrowers.	0.50	87.50
11/30/2020	CJBG	Confer and correspond with interested parties to gather their positions on Receiver's planned motion to extend the receivership deadline.	0.30	97.50
12/1/2020	SEC	Call with AHL borrowers re: mortgage settlement.	0.30	52.50
	SEC	Draft letter to AHL borrowers who have not responded to settlement offers.	0.50	87.50
	SEC	Draft and revise AHL mortgage settlement releases.	0.60	105.00
12/2/2020	SEC	Review and revise artwork listing.	0.10	17.50
	CJBG	Confer and correspond with S. Carroll re: AHL borrowers' mortgages.	0.20	65.00

Date	Init.	Description	Hours	Amount
12/2/2020	CJBG	Review and revise motion to extend receivership deadline.	0.50	162.50
12/9/2020	SEC	Call with AHL borrower re: mortgage.	0.20	35.00
	SEC	Discuss AHL borrower's mortgage with C. Gordon.	0.40	70.00
	CJBG	Confer with S. Carroll re: status of AHL borrowers' mortgages.	0.20	65.00
12/10/2020	CJBG	Draft analysis of AHL borrower title issue for T. McNamara and correspond re: same.	0.50	162.50
12/11/2020	SEC	Review documents re: AHL borrower's mortgage; prepare email to C. Gordon re: same.	0.30	52.50
	CJBG	Review AHL borrower's mortgage and confer with S. Carroll re: status of same.	0.30	97.50
	CJBG	Confer with G. Ashe re: AHL borrower title issue.	0.40	130.00
12/14/2020	SEC	Call with AHL borrower's representative re: mortgage settlement.	0.10	17.50
12/15/2020	SEC	Call with AHL borrower re: mortgage settlement.	0.10	17.50
12/16/2020	SEC	Review records re: two AHL borrower's mortgages and discuss with T. McNamara.	0.40	70.00
12/17/2020	SEC	Call with tax assessor re: AHL borrower.	0.20	35.00
1/5/2021	AMG	Confer with C. Gordon re: case status and background.	0.70	315.00
	AMG	Research and prepare release of AHL mortgage.	1.20	540.00
	CJBG	Confer with A. Greene re: case strategy.	0.70	227.50
1/6/2021	AMG	Call with AHL borrower re: mortgage.	0.40	180.00
1/7/2021	AMG	Meet with L. Jones re: AHL mortgage.	0.20	90.00
	AMG	Meet with L. Jones re: AHL mortgages; review and revise withdrawal documents re: same.	0.20	90.00
	AMG	Correspond with L. Jones re: AHL mortgages and review documents re: same.	0.30	135.00
1/11/2021	AMG	Call and correspond with AHL borrower.	0.40	180.00
	AMG	Further review and revise withdrawal documents for two AHL mortgages.	0.60	270.00
	AMG	Call with Jefferson County and Alabama tax collectors re: potential tax sale of property.	0.80	360.00

Date	Init.	Description	Hours	Amount
1/12/2021	AMG	Confer with L. Jones re: AHL mortgage property potentially involved in tax sale.	0.40	180.00
	AMG	Call with Jefferson County Tax Collector re: same.	0.10	45.00
	AMG	Confer with L. Jones re: release of AHL mortgage.	0.10	45.00
	AMG	Correspond with AHL borrower re: release of mortgage.	0.30	135.00
	AMG	Confer with L. Jones re: two AHL mortgages and release documents for same.	0.30	135.00
1/14/2021	AMG	Research and analyze Velocity default escrow issue.	2.10	945.00
	AMG	Confer with L. Jones re: Velocity default escrow issue.	0.30	135.00
	AMG	Prepare correspondence to R. Riether re: Velocity default interest issue.	0.40	180.00
1/15/2021	AMG	Correspond with C. Gordon re: Velocity default interest issue.	0.20	90.00
	AMG	Confer with L. Jones re: AHL mortgage.	0.20	90.00
	AMG	Correspond with L. Jones re: recoverability of default interest in receiverships.	0.30	135.00
	AMG	Review and revise AHL mortgage release documents.	0.30	135.00
	AMG	Call and correspond with counsel for AHL borrower.	0.40	180.00
	AMG	Further research caselaw and briefing re: recoverability of default interest in receiverships.	2.50	1,125.00
	CJBG	Confer with A. Greene re: Velocity default interest in escrow.	0.20	65.00
1/19/2021	AMG	Confer with L. Jones re: AHL mortgage.	0.10	45.00
	AMG	Call with AHL borrower's counsel re: Quit Claim Deed and withdrawal of lis pendens.	0.20	90.00
	AMG	Confer and correspond with L. Jones re: Velocity default interest issue.	0.40	180.00
	AMG	Call and correspond with R. Riether re: Velocity default interest issue.	0.60	270.00
	AMG	Review and revise documents re: AHL mortgage Quit Claim Deed and withdrawal of lis pendens.	0.70	315.00
1/20/2021	AMG	Correspond with L. Jones re: AHL mortgage release documents.	0.10	45.00
1/21/2021	AMG	Call with escrow officer.	0.20	90.00
	AMG	Confer with L. Jones re: AHL releases of mortgages for various properties.	0.20	90.00

Date	Init.	Description	Hours	Amount
1/21/2021	AMG	Correspond with escrow officer.	0.30	135.00
	AMG	Review status of outstanding AHL mortgages re: various properties.	0.70	315.00
1/22/2021	AMG	Correspond with AHL borrower's counsel re: withdrawal and transfer of documents.	0.40	180.00
	AMG	Confer with L. Jones re: potential tax and fee consequences related to AHL mortgage Quit Claim Deed.	0.10	45.00
1/25/2021	AMG	Correspond with R. Riether re: authority for default interest in receivership cases.	0.20	90.00
1/29/2021	AMG	Correspond with R. Riether re: settlement.	0.50	225.00
	AMG	Conduct research re: property redemption rights following tax sale.	0.70	315.00
2/1/2021	AMG	Correspond with L. Jones and confer with Receiver re: 1098 issues.	0.30	135.00
	AMG	Review case status and analyze Berkshire Hathaway issue.	0.40	180.00
2/2/2021	AMG	Confer with Receiver re: status of Berkshire Hathaway issue.	0.10	45.00
	AMG	Call and correspond with escrow officer re: payment for AHL borrower's property.	0.30	135.00
	AMG	Review status of Berkshire Hathaway issue.	0.40	180.00
	AMG	Review status of settlement offers to AHL borrowers and draft letters to non-responders.	1.80	810.00
2/3/2021	AMG	Correspond with escrow officer re: wire payment for AHL borrower's property.	0.20	90.00
	AMG	Confer with L. Jones re: investigation into perfection of security interests and review documents re: same.	0.40	180.00
	AMG	Revise and finalize settlement letters to AHL borrowers.	0.50	225.00
	AMG	Review background of Airbnb issue and correspond with R. Studley ressame.	1.10	495.00
2/4/2021	AMG	Correspond with various AHL borrowers re: settlement issues; conduct further research and analysis re: redemption rights.	0.80	360.00
2/5/2021	AMG	Confer with L. Jones re: release of AHL mortgage.	0.10	45.00
	AMG	Correspond with escrow officer re: release of AHL mortgage.	0.10	45.00
	AMG	Review and revise letter and release of mortgage document re: release of AHL mortgage.	0.30	135.00

Date	<u>Init.</u>	Description	Hours	Amount
2/8/2021	AMG	Correspond with R. Riether re: Velocity settlement proposal.	0.20	90.00
	AMG	Call and correspond with Humboldt County Recorder's office in Iowa re: legal description on AHL mortgage release documents.	0.20	90.00
	AMG	Review and revise AHL mortgage release documents.	0.50	225.00
2/9/2021	AMG	Correspond with escrow officer re: wire of funds for AHL borrower's property.	0.20	90.00
2/11/2021	AMG	Correspond with escrow officer re: payment for AHL borrower's property.	0.10	45.00
	AMG	Call with AHL borrower re: their mortgage.	0.10	45.00
	AMG	Correspond with L. Jones re: recorded releases of AHL mortgages; review and revise letters to borrowers re: same.	0.40	180.00
2/12/2021	AMG	Correspond with R. Studley re: Airbnb refund issue.	0.20	90.00
	AMG	Call and correspond with A. Rogosa re: Airbnb refund issue and wire instructions.	0.40	180.00
2/16/2021	AMG	Confer with Receiver re: potential sale of AHL mortgages.	0.10	45.00
	AMG	Meet with Receiver re: AHL mortgage settlement.	0.10	45.00
	AMG	Review status of potential jewelry sale.	0.20	90.00
	AMG	Review and revise settlement letter to AHL borrower.	0.30	135.00
	AMG	Call and correspond with R. Riether re: settlement of Velocity default interest issue.	0.40	180.00
	AMG	Review status of all outstanding AHL mortgage issues.	0.70	315.00
2/17/2021	AMG	Confer with L. Smith re: status of AHL mortgage settlement offers.	0.10	45.00
	AMG	Review status of AHL mortgage settlement offers.	0.30	135.00
	AMG	Correspond with R. Riether re: Velocity settlement acceptance.	0.20	90.00
	AMG	Call with AHL borrower re: borrower's property and payment of settlement amount.	0.30	135.00
2/18/2021	AMG	Call with Summit Escrow re: release of escrowed funds and correspond with R. Riether re: same.	0.30	135.00
2/22/2021	AMG	Call with AHL borrowers re: mortgage settlement offers.	0.40	180.00
2/23/2021	AMG	Review draft Velocity settlement agreement and correspond with R. Riether re: same.	0.40	180.00

Date	<u>Init.</u>	Description	Hours	Amount
2/23/2021	AMG	Conduct further investigation re: sale of AHL mortgages.	0.60	270.00
2/24/2021	AMG	Begin revisions to Velocity settlement agreement.	0.60	270.00
2/25/2021	AMG	Correspond with R. Riether re: Velocity settlement agreement revisions.	0.20	90.00
	AMG	Complete revisions to Velocity settlement agreement and correspond with Receiver re: same.	1.10	495.00
	AMG	Confer with L. Jones re: AHL mortgage interest issue.	0.20	90.00
3/1/2021	AMG	Call with R. Riether re: Velocity settlement agreement.	0.20	90.00
3/2/2021	AMG	Correspond with R. Riether and Receiver re: confidentiality issues.	0.20	90.00
	AMG	Revise Velocity settlement agreement.	0.30	135.00
3/3/2021	AMG	Call with AHL borrower re: mortgage payoff.	0.20	90.00
3/4/2021	AMG	Call with R. Riether re: executed Velocity settlement agreement and correspond with Summit Escrow re: same.	0.20	90.00
3/10/2021	AMG	Call with E. Harris re: AHL borrower's property and potential tax sale.	0.20	90.00
	AMG	Confer with L. Jones re: AHL borrower's property title issues and review deeds and reports re: same.	0.40	180.00
	AMG	Research Alabama property redemption rights.	0.50	225.00
3/12/2021	AMG	Correspond with L. Jones re: AHL mortgage.	0.20	90.00
	AMG	Call and correspond with AHL borrower re: borrower's property.	0.30	135.00
	AMG	Confer with AHL borrower re: mortgage.	0.40	180.00
3/16/2021	AMG	Review status of AHL mortgage and correspond with P. Marx re: same.	0.30	135.00
3/17/2021	AMG	Correspond with A. Rogosa re: Airbnb release of funds.	0.30	135.00
	AMG	Review and revise release of AHL mortgage.	0.30	135.00
3/18/2021	AMG	Research re: potential mortgage purchase companies.	0.70	315.00
	AMG	Review and revise correspondence to recorder's offices and coordinate execution of release documents for various AHL borrowers.	1.60	720.00
3/19/2021	AMG	Review and respond to correspondence from recorder's office re: AHL property.	0.20	90.00
3/22/2021	AMG	Further research re: potential mortgage purchasers.	0.90	405.00

Date	_ Init	Description	Hours _	Amount
3/23/2021	AMG	Call with Trustee Gladstone re: potential mortgage purchase companies and correspond with same re: potential purchases.	1.50	675.00
	AMG	Confer with L. Jones re: unresolved AHL mortgages.	0.40	180.00
	AMG	Review and analyze availability of foreclosure actions.	0.80	360.00
3/24/2021	AMG	Analyze options re: AHL property; calls with tax collector and Nebraska Alliance Realty re: same; confer with Receiver and L. Jones re: same.	1.70	765.00
	CJBG	Confer with A. Greene re: AHL mortgage.	0.10	32.50
	AMG	Correspond with additional potential mortgage purchasers.	0.30	135.00
	AMG	Research re: statute of limitations re: contract and foreclosure claims in various jurisdictions.	0.70	315.00
	AMG	Confer with Receiver re: options for AHL mortgage; draft correspondence to J. Hanley re: same.	0.80	360.00
	AMG	Compile information and draft correspondence to Receiver re: AHL mortgage.	0.80	360.00
	AMG	Calls with various AHL borrowers re: outstanding settlement offers.	0.90	405.00
3/25/2021	AMG	Correspond with J. Hanley and confer with Receiver re: same.	0.30	135.00
	AMG	Call and correspond with various AHL borrowers re: mortgage settlements.	0.70	315.00
3/26/2021	AMG	Confer with D. Magee re: sale of diamond earrings.	0.30	135.00
	AMG	Confer with L. Jones re: AHL property and research and review redemption rules and documents provided by tax office.	0.80	360.00
3/29/2021	AMG	Calls with Jefferson County and Durham County re: tax status and redemption information for various properties; calls with various AHL borrowers re: same.	1.80	810.00
3/30/2021	AMG	Correspond with J. Hanley re: Quit Claim Deed and redemption issues for AHL property; compile documents re: same for execution.	1.10	495.00
	AMG	Call with Receiver re: AHL property and potential settlement.	0.10	45.00
	AMG	Confer with L. Jones re: redemption issues for AHL property.	0.20	90.00
	AMG	Confer with Receiver re: J. Hanley proposal to purchase artwork and redemption of AHL property.	0.30	135.00
	AMG	Call with AHL borrower re: property and potential settlement.	0.40	180.00
	AMG	Confer with L. Jones re: AHL mortgage.	0.50	225.00

Date	Init.	Description	Hours	Amount
3/31/2021	AMG	Correspond with T. Parchman, Redemption Coordinator for Jefferson County, re: AHL property.	0.10	45.00
	AMG	Review and revise Quit Claim Deed for AHL property.	0.10	45.00
	AMG	Call with AHL borrower re: settlement of mortgage.	0.20	90.00
	AMG	Review packages from L. Jones.	0.20	90.00
	AMG	Call with AHL borrower re: tax issues on property.	0.40	180.00
	AMG	Confer with L. Jones re: preparation of AHL mortgage packages.	0.40	180.00
	AMG	Confer with L. Jones re: preparation of Quit Claim Deed for AHL property.	0.40	180.00
	AMG	Review outstanding issues re: close of receivership and update master AHL mortgage chart.	0.50	225.00
4/1/2021	AMG	Correspond with J. Hanley re: return of property transfer documentation.	0.20	90.00
	AMG	Review status of release for AHL property and confer with borrower re: same.	0.30	135.00
	AMG	Confer with L. Jones re: AHL property and release of mortgage form.	0.40	180.00
	AMG	Draft letter re: settlement to AHL borrower.	0.40	180.00
	AMG	Call with AHL borrower re: potential settlement of mortgage.	0.60	270.00
	AMG	Confer with L. Jones re: preparation of property packages for sale of AHL mortgages and review documents re: same.	0.70	315.00
4/2/2021	AMG	Further correspond with J. Hanley re: notarization of transfer documents.	0.20	90.00
	AMG	Confer with Receiver re: status of Quit Claim Deed from J. Hanley and status of outstanding AHL mortgages.	0.30	135.00
4/5/2021	AMG	Correspond and confer with AHL borrower re: receipt of settlement funds.	0.20	90.00
	AMG	Call with AHL borrower re: potential mortgage settlement.	0.40	180.00
4/6/2021	DCM	Research value of stud earrings and loose diamond.	1.00	175.00
	DCM	Confer with third-party service provider re: appraisal of stud earrings and loose diamond.	0.50	87.50
	AMG	Review and revise release of AHL mortgage	0.10	45.00
	AMG	Compile documentation and correspond with potential purchasers of unresolved mortgages.	1.20	540.00

Date	Init.	Description	Hours	Amount
4/6/2021	AMG	Calls with various AHL borrowers re: mortgage settlement proposals.	1.50	675.00
4/7/2021	DCM	Complete sale of loose diamond and stud earrings.	0.50	87.50
	AMG	Confer with L. Smith re: AHL mortgage.	0.10	45.00
	AMG	Continue further revisions to AHL mortgage release documents.	0.20	90.00
	AMG	Correspond with additional potential mortgage purchasers.	0.40	180.00
	AMG	Review of assembled documents re: AHL mortgage.	0.40	180.00
	AMG	Call and correspond with G. Rabbinian re: potential mortgage purchase.	0.50	225.00
4/8/2021	AMG	Further correspond with potential purchasers of mortgages.	0.90	405.00
4/9/2021	AMG	Confer with L. Jones re: AHL mortgage release documents and review/revise same.	0.30	135.00
4/12/2021	AMG	Correspond with J. Hanley re: Quit Claim Deed documents and purchase of artwork.	0.30	135.00
	AMG	Correspond with J. Marshall re: potential mortgage purchase; correspond with R. Kindred and G. Rabbinian re: same; compile additional documentation re: same.	1.40	630.00
4/13/2021	AMG	Confer with L. Jones re: conveyance of AHL property.	0.20	90.00
	AMG	Call and correspond with AHL borrower re: release of mortgage.	0.30	135.00
	AMG	Correspond to Jefferson County re: conveyance of AHL property.	0.30	135.00
4/14/2021	AMG	Confer with L. Jones re: status of AHL mortgage releases and review same.	0.20	90.00
	AMG	Confer with L. Jones re: AHL mortgage; correspond with potential purchasers re: same.	0.60	270.00
4/15/2021	AMG	Correspond with J. Hanley re: transfer of artwork.	0.10	45.00
	AMG	Correspond with J. Marshall re: purchase of AHL mortgages and research borrower files re: same.	0.30	135.00
	AMG	Review additional AHL mortgage releases and correspond with borrowers re: same.	0.40	180.00
4/16/2021	AMG	Review status of outstanding AHL mortgages and update matrix re: same.	0.60	270.00
4/19/2021	AMG	Call with AHL borrower re: mortgage.	0.10	45.00
	AMG	Call with AHL borrower re: mortgage and correspond with L. Jones re: release preparation.	0.20	90.00

Date	Init.	Description	Hours	Amount
4/19/2021	AMG	Correspond with J. Hanley re: transfer of artwork.	0.20	90.00
4/20/2021	AMG	Correspond with J. Marshall re: purchase of mortgages.	0.20	90.00
	AMG	Correspond with AHL borrower re: recorded deeds.	0.20	90.00
	AMG	Review prior status updates provided to Court and confer with Receiver re: same.	0.30	135.00
4/22/2021	AMG	Confer with L. Jones re: mortgage purchase agreement descriptions and email correspondence with J. Marshall re: same.	0.30	135.00
	AMG	Review underlying judgment in light of AMG opinion.	0.30	135.00
4/23/2021	AMG	Correspond with AHL borrowers re: mortgage releases.	0.20	90.00
4/26/2021	CJBG	Meet with internal team re: status of receivership.	0.40	130.00
	AMG	Review and revise AHL release of mortgage.	0.20	90.00
	AMG	Meet with team re: receivership status.	0.40	180.00
4/27/2021	CJBG	Follow up on tasks identified at internal team meeting re: status of receivership.	0.20	65.00
	AMG	Call with AHL borrower re: mortgage release documents.	0.20	90.00
	AMG	Review occupancy tax issue re: Park City condo and confer with L. Jones re: same.	0.30	135.00
	AMG	Compile, review, and analyze documents re: unrecorded mortgages and correspond with Receiver re: abandonment of same.	0.50	225.00
4/29/2021	AMG	Correspond with L. Jones re: letter of intent re: purchase of mortgages.	0.10	45.00
	AMG	Review and revise letter of intent re: purchase of mortgages.	0.60	270.00
4/30/2021	AMG	Correspond with Receiver re: complaint, judgment and appellate briefing re: FTC claims.	0.10	45.00
	AMG	Review and analyze complaint, judgment and appellate briefing re: FTC claims.	0.50	225.00
5/3/2021	AMG	Call with FTC re: appeal status and case update; prepare for same.	0.50	225.00
	AMG	Review and revise proposed letter of intent and correspond with Receiver and J. Marshall re: same.	1.60	720.00
5/4/2021	AMG	Call with AHL borrower re: mortgage settlement.	0.30	135.00
	AMG	Correspond with J. Marshall re: purchase of mortgages.	0.30	135.00

Date	Init.	Description	Hours	Amount
5/4/2021	AMG	Calls with AHL borrower re: mortgage settlement for property located in Winchester, Kentucky and confer with Receiver re: same.	0.40	180.00
	AMG	Confer with L. Jones re: sale of mortgages and issues re: release of AHL mortgage.	0.60	270.00
5/5/2021	AMG	Correspond with buyer of outstanding AHL mortgages re: letter of intent.	0.20	90.00
	AMG	Correspond with AHL borrower re: status of potential settlement payments on mortgage.	0.40	180.00
	AMG	Review buyer's edits to letter of intent re: sale of AHL mortgages and further revise same.	0.70	315.00
5/6/2021	AMG	Correspond with AHL borrower re: release of AHL mortgage.	0.20	90.00
	AMG	Correspond with AHL borrower re: potential settlement.	0.40	180.00
5/7/2021	AMG	Confer with L. Jones re: compilation of due diligence documentation and search for relevant correspondence.	0.30	135.00
	AMG	Research re: possible liquidation of any personal assets and correspond with G. Ashe re: same.	0.50	225.00
5/10/2021	AMG	Begin to prepare motion to continue receivership.	2.20	990.00
5/11/2021	AMG	Call and correspond with AHL borrower re: status of lien release.	0.20	90.00
	AMG	Calls with AHL borrower re: lien release; review status of deed recording.	0.30	135.00
	AMG	Continue to prepare motion to extend receivership deadline.	1.80	810.00
5/12/2021	CJBG	Review and revise draft motion to extend receivership.	0.30	97.50
	AMG	Correspond with J. Marshall re: drafting of purchase agreement.	0.10	45.00
	AMG	Correspond with counsel for parties re: extension to receivership.	0.20	90.00
	AMG	Confer with L. Jones re: release of AHL mortgages related to various properties.	0.20	90.00
	AMG	Call and correspond with counsel for Velocity re: disclosure of settlement payment.	0.50	225.00
	AMG	Continue to prepare motion to extend receivership and confer with Receiver re: same.	2.00	900.00
5/13/2021	AMG	Confer with L. Jones re: AHL mortgage release documentation	0.30	135.00
	AMG	Call with J. Haynes re: drafting of purchase agreement.	0.50	225.00

Date	Init.	Description	Hours	Amount
5/13/2021	AMG	Call and correspond with AHL borrowers re: payment of settlement amounts and receipt of same.	0.70	315.00
	AMG	Review and compile additional documents for J. Haynes and correspond with J. Haynes re: same.	2.30	1,035.00
5/18/2021	AMG	Correspond with J. Haynes re: drafting of purchase agreement.	0.30	135.00
	AMG	Further review documents compiled for due diligence re: sale of AHL mortgages and confer with L. Jones re: same.	1.60	720.00
5/19/2021	AMG	Continue to review additional documents to provide for due diligence re: AHL mortgage sales; confer with L. Jones re: same .	1.20	540.00
5/20/2021	AMG	Confer with C. Gordon re: status report.	0.10	45.00
	AMG	Confer with C. Gordon and Receiver re: case strategy.	0.20	90.00
	AMG	Review and update status of AHL mortgages.	0.20	90.00
	AMG	Confer with L. Jones re: due diligence documents and prepare letter to J. Haynes re: same.	0.70	315.00
5/24/2021	AMG	Correspond with AHL borrower re: release of mortgage and compile documents re: same.	0.40	180.00
	AMG	Correspond with AHL borrower re: release of mortgage and compile documents re: same.	0.40	180.00
6/8/2021	AMG	Correspond with J. Haynes re: purchase agreement.	0.10	45.00
6/21/2021	AMG	Review and revise purchase agreement; correspond with L. Jones re: same.	1.60	720.00
6/24/2021	AMG	Review L. Jones revisions to draft purchase agreement and further revise same; correspond with T. McNamara re: same.	1.10	495.00
6/25/2021	AMG	Further revise draft purchase agreement and correspond with J. Haynes ressame.	1.10	495.00
7/12/2021	AMG	Review and analyze proposed edits to purchase agreement; begin to revise to same.	0.80	360.00
7/13/2021	AMG	Call and correspond with J. Haynes re: additional revisions to purchase agreement.	1.10	495.00
7/21/2021	AMG	Review revised purchase agreement and correspond with J. Haynes ressame.	0.80	360.00
7/23/2021	AMG	Correspond with buyer's counsel re: purchase agreement and exhibits.	0.30	135.00
	AMG	Prepare exhibits.	0.60	270.00

Date	<u>Init.</u>	Description	Hours	Amount
7/26/2021	AMG	Review and finalize agreement for signatures; correspond with buyer's counsel re: same.	0.30	135.00
8/2/2021	AMG	Review appellate docket and recent filings; correspond with T. McNamara re: same.	0.70	315.00
8/18/2021	AMG	Draft final report and fee application; confer with T. McNamara re: potential extension and related issues.	1.50	675.00
9/9/2021	AMG	Review sale agreement re: sale of notes and consequences of expiration of due diligence period.	0.30	135.00
	AMG	Review and revise final report and fee application.	2.60	1,170.00
9/16/2021	AMG	Review and revise final report and fee application.	2.20	990.00
9/17/2021	AMG	Review and revise final report and fee application.	2.80	1,260.00
9/20/2021	AMG	Review closing requirements re: sale of notes and receivership deadlines.	0.70	315.00
9/22/2021	CJBG	Review and revise final report and fee application.	3.10	1,007.50
9/23/2021	AMG	Complete draft of final report and correspond with T. McNamara re: same.	1.80	810.00
9/27/2021	AMG	Correspond with J. Haynes re: closing documents re: sale of notes; begin to review and revise same.	2.20	990.00
9/28/2021	AMG	Continue to review and revise closing documents re: sale of notes; correspond with J. Haynes re: same.	1.90	855.00
9/29/2021	AMG	Finalize closing documents re: sale of notes and attend to closing; correspond with buyer's counsel re: same.	2.30	1,035.00
9/30/2021	AMG	Correspond with buyer's counsel re: sale of notes and closing; review changes to assignment agreement.	0.50	225.00
	TOTAL F	TEES	227.70	\$83,125.00
DISRURSE	MENTS			

### DISBURSEMENTS

<u>Date</u>	Description	
4/30/2020	Postage	3.00
5/15/2020	Other: Notary services (E. Chang) re: release of lis pendens re: Sandy Office Building and Park City Condo	15.00
6/30/2020	Online research: PACER	22.30
9/30/2020	Online research: PACER	17.40

<u>Date</u>	Description	Amount
9/30/2020	Postage	8.50
10/31/2020	Postage	17.70
12/31/2020	Online research: PACER	9.50
1/31/2021	Online research: Westlaw	65.39
2/28/2021	Postage	10.85
3/31/2021	Online research: PACER	5.90
	Postage	7.20
4/30/2021	Postage	7.00
5/31/2021	Postage	12.65
6/30/2021	Postage	1.20
9/30/2021	Online research: PACER	8.90
TOTAL	DISBURSEMENTS	\$212.49
TOTAL	CURRENT CHARGES	\$83,337.49

### PROFESSIONAL SERVICES SUMMARY

Name	Hours	Rate	Amount
Andrew M. Greene	126.80	450.00	\$57,060.00
Cornelia J. B. Gordon	15.80	325.00	\$5,135.00
Edward Chang	34.50	350.00	\$12,075.00
Shoshanna E. Carroll	48.60	175.00	\$8,505.00
David C. Magee	2.00	175.00	\$350.00